PROXY COST MODELS ARE UNNECESSARY AND INAPPROPRIATE

UNIVERSAL SERVICE SUPPORT SHOULD BE EVALUATED BASED ON ACTUAL COSTS FOR LOCAL EXCHANGE NETWORK ACCESS AND THE REVENUES WHICH SUPPORT THESE COSTS. PROXY MODELS PRODUCE HYPOTHETICAL COSTS UNRELATED TO THE ACTUAL COSTS AND REVENUES TO PROVIDE NETWORK ACCESS.

- Models are not based on real world experience. They
 produce costs for a hypothetical network which will never be
 built (and very likely could not be built at the TSLRIC proxy
 cost) and which will never process a call.
- Models are continuously being revised to incorporate new assumptions, correct errors, etc. When are they correct?
- Models are built on differing sets of inappropriate assumptions about network architecture, network technology, costs to be included, etc.
- Different models (U.S. West Benchmark Cost Model, Hatfield Model, Pacific Bell Cost Proxy Model) produce different results. Each model overstates or understates the necessary costs to deploy a universally available network.

PROXY COST MODELS ARE UNNECESSARY AND INAPPROPRIATE

(continued)

PROXIES NEED TO REASONABLY REPLICATE VARIATIONS IN ACTUAL COST FROM STATE TO STATE, WIRE CENTER TO WIRE CENTER, AND BETWEEN COMPANIES.

- Models do not accomplish this result.
- Before they can be used, they should reasonably replicate actual costs.

PROXIES MISASSIGN COSTS TO EXISTING LECS.

 The priceouts use census blocks which do not conform to ownership.

				W	HICH COS	T IS RIGH	IT?		
LOCAL	Actual Costs		Hatfield	Models		Benchmark Cost Mo BCM (per household, per month) Expenses based on ARMIS Hatfield		odelş	
EXCHANGE COSTS	(per loop, per month)	<u>Original</u> (per household, per month)	AT&T Version 2.2 Release 1 (per line, per month)	MCI Version 2.2 <u>Release 1</u> (per line, per month)	AT&T Version 2.2 <u>Release 2</u> (per line, per month)			BCM2 (per line, per month) Expenses based on ARMIS	California <u>Cost Proxy Model</u> (per line, per month)
Nationwide		\$21.36				\$23.04	\$16.71	\$29.98	
SWBT - Arkansas	\$39.59					\$24.40	\$17.69	\$34.24	
TOTAL - Arkansas			\$21.76	\$20.82		\$33.56	\$24.34	\$40.97	
SWBT - Kansas	\$35.27				\$20.99	\$23.23	\$16.85	\$29.28	
TOTAL - Kansas			\$20.02	\$19.19		\$33.01	\$23.94	\$35.37	
SWBT - Missouri	\$36.83					\$20.66	\$14.98	\$28.11	
TOTAL - Missouri			\$19.15	\$18.34		\$28.43	\$20.61	\$34.17	
SWBT - Oklahoma	\$36.05					\$19.38	\$14.05	\$30.60	
Total Oklahoma			\$19.62	\$18.77		\$26.59	\$19.29	\$35.06	
SWBT - Texas	\$37.03				\$15.41	\$20.73	\$15.03	\$27.25	\$34.00 EST.
Total Texas			\$16.11	\$15.41		\$25.14	\$18.23	\$29.98	
	1993 Data from USF Data Submission of September, 1995; SWBT Wire Center Study of October, 1995	MCI Hatfield Study July, 1994	AT&T Filing 7/3/96 CC Dkt No. 96-98	MCI Filing 7/7/96 CC Docket Nos. 96-45 & 96-98	AT&T Filing 8/5/96 Kansas Docket No. 190,492-U; AT&T Filing 8/19/96 Texas Dkt # 16226	Joint Sponsors (US West/SPRINT /NYNEX/MCI), 12/1/95 Filing in CC Docket No. 80-286 and		US West/Sprint Ex Parte, 7/3/96 CC Docket No. 96-45 (default input & output values)	reference: Pacific Telesis Filing, 6/3/96 CC Docket No. 96-45; also Data Request response due 8/15/96

HATFIELD/TSLRIC MODEL IS INAPPROPRIATE AND SUBSTANTIALLY UNDERSTATES ACTUAL COSTS

COMPLETE INFORMATION ON MODEL HAS NOT BEEN READILY AVAILABLE.

- Original Hatfield model provided only nationwide results.
- Later, Hatfield Release 2.2 produced only a total state result.
- Results from the newest version are being filed in State
 Commission hearings, but apparently not been made available in
 the federal docket. The model and its assumptions are
 unavailable to SWBT.

INVESTMENT IS SUBSTANTIALLY UNDERSTATED.

- Network elements necessary to provide service are omitted.
 - The model excludes investments related to motor vehicles and work equipment, and investments associated with plant under construction and materials & supplies.
 - The model only identifies land and building costs for switching-related facilities. The model excludes necessary land and building costs (for central office circuit facilities, etc.).
 - The BCM model, which the Hatfield model uses, to this point has omitted the cable connection costs from the distribution plant to the customer's house (the drop). AT&T claims that in their latest version presumably filed with the FCC (which is unavailable to SWBT for analysis), drop costs are included. It is unclear, consequently, if an appropriate amount is included. Exclusion of these costs could amount to approximately \$400 million in investment for SWBT in Missouri.

HATFIELD/TSLRIC MODEL IS INAPPROPRIATE AND SUBSTANTIALLY UNDERSTATES ACTUAL COSTS

(continued)

- Costs for installation and support structures are understated. For instance, in reality, trenching cost is essentially the same for large, medium, and small cable sizes. The model loads an average trenching cost per cable pair, understating the placement costs of many of SWBT's cables.
- The Hatfield model relies on the Benchmark Cost Model (BCM) for various elements including fill or capacity utilization. The fill factors are not realistic and can and have been utilized to understate investment in the Hatfield model. Release 2.2 of the Hatfield model used a lower fill factor than the BCM, resulting in higher investment. Finally, the model has not been updated with the latest BCM2 fill which would substantially raise investments.
- The model uses a very conservative rate of return --- well below the authorized federal return.
- The capital recovery assumptions in the model are suspect, if not wrong. Even though much shorter depreciable lives are used, the model calculates depreciation reserves over a 32 year period. This substantially understates net investment.
- The model relies on incorrect input assumptions. For instance, the model assigns entire CBG costs to one LEC, when in fact CBGs are often served by different LECs, and costs should be split among LECs.

HATFIELD/TSLRIC MODEL IS INAPPROPRIATE AND SUBSTANTIALLY UNDERSTATES ACTUAL COSTS

(continued)

EXPENSES ARE SUBSTANTIALLY UNDERSTATED.

- Maintenance and depreciation expense are calculated based on investment levels. Because investments are understated, the expenses are understated.
- Release 2.2 of the model excludes customer service expenses from its cost calculation, even though customers would still have to order service, inquire about bills, etc.
- The model excludes marketing expenses even though these expenses are required by the Federal Act to advertise the availability of universal services.

SOUTHWESTERN BELL TELEPHONE COMPANY--MISSOURI LOCAL EXCHANGE COSTS (SWITCHED SERVICES) COMPARISON OF HATFIELD MODEL VER 2.2 RELEASE 1 COSTS WITH SWBT 1995 ACTUAL COSTS

		HATFIELD	SWBT	DIFFERENCE
	Direct Facility Invest.			
	COE	772,590,262	1,099,034,095	(326,443,
	C&WF	606,769,695	1,623,530,880	(1,016,761,
	IOT	38,576,200	75,039,189	(36,462,
	Operator Systems	0	10,938,195	(10,938,
	Total Direct Facility Investment	1,417,936,158	2,808,542,359	(1,390,606,
	COE Reserves C&WF Reserves	315,663,602	414,319,729 691,113,304	(98,656, (476,671,
	IOT Reserves	214,442,005 18,738,464	41,755,355	(23,016,
	Oper Sys Reserves	10,730,404	3,818,139	(3,818,
	COE Deferred Taxes	0	179,633,813	(179,633,
	C&WF Deferred Taxes	0	126,187,550	(126,187,
	IOT Deferred Taxes	0	9,255,719	(9,255,
	Oper Sys Deferred Taxes	0	1,708,367	(1,708,
	Total Direct Facility Reserves	548,844,072	1,467,791,976	(918,947,
	Net Investment	869,092,086	1,340,750,383	(471,658,
				(,)
17	Direct Return and Tax	120,305,170	218,646,859	_(98,341,6
	Direct Facility Exp.			
18	COE Maint.	23,517,983	51,501,660	(27,983,
	C&WF Maint.	165,606,094	100,644,722	64,961,
	IOT Maint.	32,436,533	24,167,753	8,268,
	OS Maint.	0	840,582	(840,
22	COE Depreciation	51,180,253	96,900,455	(45,720,
	C&WF Depreciation	26,445,107	81,031,311	(54,586,
	IOT Depreciation	4,286,244	5,770,891	(1,484,
	OS Depreciation	50,000,000	776,697	(776,0
	Network Operations	58,689,208	81,414,395	(22,725,
	Property Tax Total Direct Expense	362 161 422	55,609,139	(55,609,
29	Total Direct Expense	362,161,423	498,657,605	(136,496,
29	Total Direct Cost	482,466,593	717,304,464	(234,837,
	Customer Service Related Expense			
	Customer Service Exp. (1)		58,728,955	(58,728,
	Operator Services (1)	ō	24,698,115	(24,698,
32	Total Customer Services Expenses	0	83,427,069	(83,427,0
d	Network and Service Support Investments			
33	Gen. Sup. Fac. Inv.	268,955,188	857,523,914	(588,568,
9	Oth. Investment	0	56,278,360	(56,278,
34				/400 000
34 35	Gen. SupDef. Taxes	0	100,090,797	(100,090,
34 35 36	Gen. SupDef. Taxes GSF Reserves	0 136,786,018	255,234,135	
34 35 36 37	Gen. SupDef. Taxes GSF Reserves Other Reserves	136,786,018 0	255,234,135 5,938,786	(118,448, (5,938,
34 35 36 37	Gen. SupDef. Taxes GSF Reserves	136,786,018	255,234,135	(100,090,7 (118,448,7 (5,938,7 (420,369,7
34 35 36 37 38	Gen. SupDef. Taxes GSF Reserves Other Reserves	136,786,018 0	255,234,135 5,938,786	(118,448, (5,938,
34 35 36 37 38	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax	136,786,018 0 132,169,170	255,234,135 5,938,786 552,538,556	(118,448, (5,938, (420,369,
34 35 36 37 38	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses	136,786,018 0 132,169,170 20,196,888	255,234,135 5,938,786 552,538,556 90,106,844	(118,448, (5,938, (420,369, (69,909,9
34 35 36 37 38 39	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF)	136,786,018 0 132,169,170 20,196,888	255,234,135 5,938,786 552,538,556 90,106,844	(118,448, (5,938, (420,369, (69,909,§
34 35 36 37 38 39 40 41	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization	136,786,018 0 132,169,170 20,196,888 12,921,738 0	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314	(118,448, (5,938, (420,369,3 (69,909,9 (37,920,3 (4,785,3
34 35 36 37 38 39 40 41 42	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses	136,786,018 0 132,169,170 20,196,888	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984)	(118,448, (5,938, (420,369, (69,909,9 (37,920, (4,785, 16,463,
34 35 36 37 38 39 40 41 42 43	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization	136,786,018 0 132,169,170 20,196,888 12,921,738 0	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314	(118,448, (5,938, (420,369,369,366),366,37,920,366,4785,366,463,366,463,369,1,566,463,366,463,366,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,369,156,463,463,464,464,464,464,464,464,464,46
34 35 36 37 38 39 40 41 42 43 44	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947	(37,920,3 (4,785,3 (3,091,5 (3,091,5 (3,091,5 (3,091,5 (3,091,5
34 35 36 37 38 39 40 41 42 43 44	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other Other Taxes Total Support Expenses	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0 27,804,995	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425	(37,920, (4,785, 15,988,
34 35 36 37 38 39 40 41 42 43 44	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other Other Taxes Total Support Expenses Common Costs	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0 27,804,995 39,622,105	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	(37,920, (4,785, 16,463, (33,945,6
34 35 36 37 38 39 40 41 42 43 44 45	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other Other Taxes Total Support Expenses Common Costs Marketing	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0 27,804,995 39,622,105	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	(37,920, (4,785, 16,463, (33,091, (13,345,6
34 35 36 37 38 39 40 41 42 43 44 45 1	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other Other Taxes Total Support Expenses Common Costs	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0 27,804,995 39,622,105	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	(118,448, (5,938, (420,369,3
34 35 36 37 38 39 40 41 42 43 44 45 1 (46 47	Gen. SupDef. Taxes GSF Reserves Other Reserves Net Investment Support Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses Other Other Taxes Total Support Expenses Common Costs Marketing	136,786,018 0 132,169,170 20,196,888 12,921,738 0 (1,104,628) 0 27,804,995 39,622,105	255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	(37,920, (4,785, 15,988, (420,369, (69,909,§

SOUTHWESTERN BELL TELEPHONE COMPANY--MISSOURI LOCAL EXCHANGE COSTS (SWITCHED SERVICES) COMPARISON OF HATFIELD MODEL VER 2.2 RELEASE 1 COSTS WITH SWBT 1995 ACTUAL COSTS

TOTAL EXCLUDING PRIVATE LINE	TOTAL LOCAL	LOOP	SWITCH	TRANSPOR
Direct Facility Invest.				
2 COE	(326,443,833)	(221,190,824)	(126,196,350)	20,943,3
3 C&WF	(1,016,761,185)	(977,907,510)	NA	(38,853,6
4 IOT	0	NA NA	NA	
5 Operator Systems	(10,938,195)	NA	(10,938,195)	
6 Total Direct Facility Investment	(1,390,606,201)	(1,235,561,323)	(137,134,545)	(17,910,3
7 COE Reserves	(98,656,127)	(82,701,210)	(25,288,289)	9,333,
8 C&WF Reserves	(476,671,299)	(463,895,728)	NA NA	(12,775,
9 IOT Reserves	(2.040.420)	NA NA	NA (2.849.420)	
10 Oper Sys Reserves 11 COE Deferred Taxes	(3,818,139) (179,633,813)	NA (51,685,525)	(3,818,139)	(16,158,
12 C&WF Deferred Taxes	(126,187,550)	(120,061,968)	NA	(6,125,
13 IOT Deferred Taxes	(120,107,550)	NA	NA NA	10,120,
14 Oper Sys Deferred Taxes	(1,708,367)	NA NA	(1,708,367)	
15 Total Direct Facility Reserves	(918,947,904)	(750,617,041)	(142,604,227)	(25,726,
16 Net Investment	(471,658,297)	(484,944,282)	5,469,682	7,816,
17Direct Datum and Tax	(00 202 474)	(00 000 748)	(E 629 006)	249,4
17 Direct Return and Tax	(96,303,174)	(90,923,748)	(5,628,906)	
Direct Facility Exp.	407.000.077	(5.804.074)	(04.000.054)	0.404
18 COE Maint.	(27,983,677)	(5,821,371)	(24,293,654)	2,131,
19 C&WF Maint. 20 IOT Maint.	64,961,372 0	67,023,041 NA	NA NA	(2,061,
21 OS Maint.	(840,582)	NA NA	(840,582)	
22 COE Depreciation	(45,720,202)	(18,308,048)	(25,603,769)	(1,808,
23 C&WF Depreciation	(54,586,204)	(53,919,569)	NA	(666,
24 IOT Depreciation	0	NA	NA	
25 OS Depreciation	(776,697)	NA	(776,697)	
26 Network Operations	(22,725,187)	(20,063,867)	(3,048,799)	387,
27 Property Tax				
28 Total Direct Expense	(136,496,182)	(64,929,295)	(65,651,149)	(5,915,7
29 Total Direct Cost	(232,799,356)	(155,853,043)	(71,280,055)	(5,666,2
Customer Service Related Expense		- '		
30 Customer Service Exp. (1)	(58,728,955)	(42,442,006)	(12,451,537)	(3,835,
31 Operator Services (1)	(24,698,115)	(17,848,735)	(5,236,420)	(1,612,
32 Total Customer Services Expenses	(83,427,070)	(60,290,741)	(17,687,957)	(5,448,3
Network and Service Support Investments				
33 Gen. Sup. Fac. Inv.	(588,568,726)	(519,784,706)	(54,605,198)	(14,178,
Oth. Investment	(56,278,360)	(44,210,094)	(8,529,571)	(3,538,
35 Gen. SupDef. Taxes 36 GSF Reserves	(100,090,797)	(73,459,306)	(20,697,682)	(5,933,
37 Other Reserves	(118,448,117) (5,938,786)	(123,161,341) (4,343,136)	(467,891) (1,194,392)	5,181, (401,
38 Net Investment	(420,369,386)	(363,031,018)	(40,774,804)	(16,563,
SSSupport Investment Return and Tax	(71,948,472)	(60,263,781)	(7,959 <u>,67</u> 7)	(3,725,0
Network and Service Support Expenses				
Depreciation (GSF)	(37,920,357)	(32,137,607)	(4,029,286)	(1,753,4
11 Amortization	(4,785,314)	(3,499,583)	(962,409)	(323,
10 005 5	16,463,357	12,458,870	3,059,310	945,
		(2,268,672)	(638,100)	(185,
42 GSF Expenses 43 Other	(3,091,947)			0.404.1
13 Other	(3,091,947) 15,988,570	10,191,168	3,632,901	2,164,
13 Other 14 Other Taxes			3,632,901 1,062,417	
13 Other 14 Other Taxes	15,988,570	10,191,168		2,164,6 847 ,7
13 Other 14 Other Taxes 15 Total Support Expenses Common Costs	15,988,570	10,191,168		
43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing	15,988,570 (13,345,691)	10,191,168 (15,255,824)	1,062,417	847,7
43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing 47 Corporate	(13,345,691) (23,279,585)	(15,255,824) (16,823,597)	1,062,417	847,7 (1,520,;
43 Other 44 Other Taxes 45 Total Support Expenses	(13,345,691) (23,279,585) (40,579,791)	(15,255,824) (16,823,597) (31,575,224)	1,062,417 (4,935,668) (8,496,578)	(1,520,3 (507,9

SOUTHWESTERN BELL TELEPHONE COMPANY--MISSOURI LOCAL EXCHANGE COSTS (SWITCHED SERVICES) HATFIELD MODEL VER 2.2 RELEASE 1 RESULTS

TOTAL EXCLUDING PRIVATE LINE	TOTAL LOCAL	LOOP	SWITCH	TRANSPOR
Direct Facility Invest.				
2 COE	772,590,262	210,748,650	422,847,655	138,993,9
3 C&WF	606,769,695	566,811,547	NA	39,958,1
4 IOT	38,576,200	38,576,200	NA	NA
5 Operator Systems	0	NA	0	NA
6 Total Direct Facility Investment	1,417,936,158	816,136,397	422,847,655	178,952,1
7 COE Reserves	315,663,602	99,573,337	159,030,159	57,060,1
8 C&WF Reserves	214,442,005	193,668,538	NA	20,773,4
9 IOT Reserves	18,738,464	18,738,464	NA	NA
10 Oper Sys Reserves	0	NA	0	NA
11 COE Deferred Taxes	0	0	0	
12 C&WF Deferred Taxes	0	0	NA	
13 IOT Deferred Taxes	0	0	NA	NA
14 Oper Sys Deferred Taxes	0	NA	0	NA
15 Total Direct Facility Reserves	548,844,072	311,980,339	159,030,159	77,833,5
16 Net Investment	869,092,086	504,156,058	263,817,496	101,118,5
10 IVEL IIIVESIMENI	009,092,000	304,130,036	203,617,490	101,110,
17 Direct Return and Tax	120,305,170	68,970,229	36,091,113	15,243,8
Direct Facility Exp.				
18 COE Maint.	23,517,983	5,748,207	11,544,332	6,225,4
19 C&WF Maint.		162,782,119	11,544,332	2,823,9
	165,606,094			
20 IOT Maint.	32,436,533	32,436,533	NA	NA NA
21 OS Maint.	0	NA	NA	NA NA
22 COE Depreciation	51,180,253	21,074,865	21,289,947	8,815,4
23 C&WF Depreciation	26,445,107	23,178,201	0	3,266,9
24 IOT Depreciation	4,286,244	4,286,244	NA	NA
25 OS Depreciation	0	NA	NA NA	NA
26 Network Operations	58,689,208	39,411,016	13,184,039	6,094,1
27 Property Tax	0			
28 Total Direct Expense	362,161,423	288,917,186	46,018,318	27,225,9
29 Total Direct Cost	482,466,593	357,887,415	82,109,431	42,469,7
Customer Service Related Expense				
30 Customer Service Exp. (1)	0	0	0	
31 Operator Services (1)	0	0	0	
32 Total Customer Services Expenses	0	0	0	
Network and Service Support Investments				
33 Gen. Sup. Fac. Inv.	268,955,188	109,574,974	122,721,360	36,658,8
34 Oth. Investment	200,933,100	0	0	30,030,0
35 Gen. SupDef. Taxes	0		0	
36 GSF Reserves				20 242
	136,786,018	64,161,801	52,311,734	20,312,4
37 Other Reserves	100 100 170	45 440 470	0	40.040.0
38 Net Investment	132,169,170	45,413,172	70,409,626	16,346,3
39 Support Investment Return and Tax	20,196,888	7,830,183	10,606,787	1,759,9
Network and Service Support Expenses			<u>_</u>	4 200 0
40 Depreciation (GSF)	12,921,738	5,176,763	6,484,303	1,200,0
40 Depreciation (GSF) 41 Amortization	0	0	0	
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses				
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other	0 (1,104,628) 0	0 (434,743) 0	0 (573,557) 0	1,260,6 (96,3
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses	0	0	0	(96,3
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes	0 (1,104,628) 0 27,804,995	0 (434,743) 0 18,877,029	0 (573,557) 0 6,105,690	(96,3 2,822,2
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses	0 (1,104,628) 0	0 (434,743) 0	0 (573,557) 0	(96,3 2,822,2
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs	0 (1,104,628) 0 27,804,995 39,622,105	0 (434,743) 0 18,877,029 23,619,049	0 (573,557) 0 6,105,690 12,016,436	(96,3 2,822,2
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing	0 (1,104,628) 0 27,804,995 39,622,105	0 (434,743) 0 18,877,029 23,619,049	(573,557) 0 6,105,690 12,016,436	(96,3 2,822,2 3,986,6
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing 47 Corporate	0 (1,104,628) 0 27,804,995 39,622,105 0 54,166,028	0 (434,743) 0 18,877,029 23,619,049 0 37,961,261	0 (573,557) 0 6,105,690 12,016,436 0 11,095,820	(96,3 2,822,2 3,986,6 5,108,9
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing	0 (1,104,628) 0 27,804,995 39,622,105	0 (434,743) 0 18,877,029 23,619,049	(573,557) 0 6,105,690 12,016,436	(96,3 2,822,2 3,986,6 5,108,9
40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs 46 Marketing 47 Corporate	0 (1,104,628) 0 27,804,995 39,622,105 0 54,166,028	0 (434,743) 0 18,877,029 23,619,049 0 37,961,261	0 (573,557) 0 6,105,690 12,016,436 0 11,095,820	

^{*} Property Tax not identifiable in study, probably included in other taxes.

SOUTHWESTERN BELL TELEPHONE COMPANY--MISSOURI LOCAL EXCHANGE COSTS (SWITCHED SERVICES) MISSOURI 1995 WIRE CENTER COST STUDY

TOTAL EXCLUDING PRIVATE LINE	TOTAL LOCAL	LOOP	SWITCH	TRANSPORT
Direct Facility Invest.				
2 COE	1,099,034,095	431,939,474	549,044,005	118,050,61
3 C&WF	1,623,530,880	1,544,719,057	NA	78,811,82
4 IOT	75,039,189	75,039,189	NA	NA
5 Operator Systems	10,938,195	NA	10,938,195	NA
6 Total Direct Facility Investment	2,808,542,359	2,051,697,720	559,982,200	196,862,43
7 COE Reserves	414,319,729	182,274,547	184,318,448	47,726,73
8 C&WF Reserves	691,113,304	657,564,266	NA	33,549,03
9 IOT Reserves	41,755,355	41,755,355	NA	NA
10 Oper Sys Reserves	3,818,139	NA	3,818,139	NA
11 COE Deferred Taxes	179,633,813	51,685,525	111,789,432	16,158,85
12 C&WF Deferred Taxes	126,187,550	120,061,968	NA	6,125,58
13 IOT Deferred Taxes	9,255,719	9,255,719	NA	NA
14 Oper Sys Deferred Taxes	1,708,367	NA	1,708,367	NA
15 Total Direct Facility Reserves	1,467,791,976	1,062,597,380	301,634,386	103,560,21
16 Net Investment	1,340,750,383	989,100,340	258,347,814	93,302,22
17 Direct Return and Tax	218,646,859	159,893,977	41,720,019	14,994,34
Direct Facility Exp. 18 COE Maint.	E4 E01 GG0	11 ECO E70	35,837,986	4,094,09
	51,501,660	11,569,578		4,885,64
19 C&WF Maint.	100,644,722	95,759,078	NA NA	4,665,64 NA
20 IOT Maint. 21 OS Maint.	24,167,753	24,167,753	NA 040 500	
	840,582	NA 202 042	840,582	NA 10.522.85
22 COE Depreciation	96,900,455	39,382,913	46,893,716	10,623,82
23 C&WF Depreciation	81,031,311	77,097,770	NA NA	3,933,54
24 IOT Depreciation	5,770,891	5,770,891	NA 770 007	NA NA
25 OS Depreciation	776,697	NA 50.474.000	776,697	NA
26 Network Operations	81,414,395	59,474,883	16,232,838	5,706,67
27 Property Tax_	55,609,139	40,623,615	11,087,648	3,897,87
28 Total Direct Expense	498,657,605	353,846,481	111,669,467	33,141,65
29 Total Direct Cost	717,304,464	513,740,458	153,389,486	48,136,00
Customer Service Related Expense	 			
30 Customer Service Exp. (1)	58,728,955	42,442,006	12,451,537	3,835,41
31 Operator Services (1)	24,698,115	17,848,735	5,236,420	1,612,96
32 Total Customer Services Expenses	83,427,069	60,290,741	17,687,957	5,448,37
Network and Service Support Investments	057 500 044	COO 350 600	477 200 FEO	50 027 67
33 Gen. Sup. Fac. Inv. 34 Oth. Investment	857,523,914 56,278,360	629,359,680 44,210,094	177,326,558 8,529,571	50,837,67
	DO 270 30U		8.529.571	3,538,69
RE Con Sun Dof Touco				E 022 00
Gen. SupDef. Taxes	100,090,797	73,459,306	20,697,682	
36 GSF Reserves	100,090,797 255,234,135	73,459,306 187,323,142	20,697,682 52,779,625	15,131,36
36 GSF Reserves 37 Other Reserves	100,090,797 255,234,135 5,938,786	73,459,306 187,323,142 4,343,136	20,697,682 52,779,625 1,194,392	15,131,36 401,25
36 GSF Reserves	100,090,797 255,234,135	73,459,306 187,323,142	20,697,682 52,779,625	15,131,36 401,25
36 GSF Reserves 37 Other Reserves	100,090,797 255,234,135 5,938,786	73,459,306 187,323,142 4,343,136	20,697,682 52,779,625 1,194,392	15,131,36 401,25 32,909,93
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax	100,090,797 255,234,135 5,938,786 552,538,556	73,459,306 187,323,142 4,343,136 408,444,190	20,697,682 52,779,625 1,194,392 111,184,430	15,131,36 401,25 32,909,93
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464	15,131,36 401,25 32,909,93 5,484,93
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF)	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464	5,933,80 15,131,36 401,25 32,909,93 5,484,93
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409	15,131,36 401,25 32,909,93 5,484,93 3,014,13
Other Reserves Net Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984)	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613)	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867)	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50 185,17
Other Reserves Net Investment Return and Tax Network and Service Support Expenses Depreciation (GSF) Amortization GSF Expenses	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984)	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613)	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867)	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50 185,17 657,77
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100	15,131,36 401,29 32,909,93 5,484,93 3,014,13 323,33 (1,041,50 185,17 657,77
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861 38,874,873	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789 10,954,019	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50 185,17 657,77 3,138,90
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses 46 Marketing	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861 38,874,873	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789 10,954,019	15,131,36 401,25 32,909,93 5,484,93 3,014,15 323,32 (1,041,50 185,17 657,77 3,138,90
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses Common Costs	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861 38,874,873	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789 10,954,019	15,131,36 401,25 32,909,93 5,484,93 3,014,15 323,32 (1,041,50 185,17 657,77 3,138,90
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses 46 Marketing	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861 38,874,873	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789 10,954,019	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50 185,17 657,77
36 GSF Reserves 37 Other Reserves 38 Net Investment 39 Support Investment Return and Tax Network and Service Support Expenses 40 Depreciation (GSF) 41 Amortization 42 GSF Expenses 43 Other 44 Other Taxes 45 Total Support Expenses 46 Marketing 47 Corporate	100,090,797 255,234,135 5,938,786 552,538,556 90,106,844 50,842,095 4,785,314 (17,567,984) 3,091,947 11,816,425 52,967,795 23,279,585 94,745,819	73,459,306 187,323,142 4,343,136 408,444,190 68,093,964 37,314,370 3,499,583 (12,893,613) 2,268,672 8,685,861 38,874,873	20,697,682 52,779,625 1,194,392 111,184,430 18,566,464 10,513,589 962,409 (3,632,867) 638,100 2,472,789 10,954,019 4,935,668 19,592,398	15,131,36 401,25 32,909,93 5,484,93 3,014,13 323,32 (1,041,50 185,17 657,77 3,138,90 1,520,32 5,616,93

Unit Cost by Network Element

Missouri

SOUTHWESTERN BELL - MO

A.	Loop	elements

			0 - 5		5 - 200		200 - 650		650 - 850		860 - 2660		> 2660		Totals	
	Loop Distribution															
	Annual Cost Units	\$	10,499,628 25,700	\$	89,874,139 406,642	\$	58,270,454 397,780	•	19,125,523 144,215		147,132,260 1,195,368	\$	71,627,322 643,380	\$	396,529,326 2,812,984	\$ 396,529,326
	Unit Cost/month	•	34.05	\$	18.42	\$	12.21	\$	11.05	\$		\$	9.28	\$	11.75	
	Loop Concentration															
	Annual Cost Units	\$	2,938,677 25,700	ş	20,268,316 406,642	ş	14,418,790 397,780	\$	4,285,941 144,215	\$	25,332,570 1,195,368	Ş	7,361,840 643,380	ş	74,606,134 2,812,984	\$ 74,606,134
	Unit Cost/month	\$	9.53	\$	4.15	\$	3.02	\$	2,48	\$		\$	0.96	\$	2.21	
	Loop Feeder													_		
	Annual Cost Units	\$	587,648 25,700	\$	3,194,361 406,542	\$	2,381,887	*	929,988	\$	11,650,711 1,195,368	Ş	7,631,529 643,380	\$	26,376,123 2,812, 9 84	\$ 26,376,123
	Unit Coet/month	\$	1.91	\$	0.65	\$	397,780 0.50	\$	144,215 0.54	\$		\$	0.99	\$	0.78	
	Total Loop Annual Cost		44.000.000				•• •••				45.445.546				403 544 500	A 403 E14 F00
	Units	\$	14,025,953 25,700	ş	113,336,816 406,542	ş	75,071,131 397,780	\$	24,341,462 144,216	Ş	184,115,540 1,196,388	¥	86,620,690 643,380	\$	497,611,683 2,812,984	\$497,511,583
	Unit Cost/month	\$	45.48	\$	23.23	\$	15.73	\$	14.07	\$		\$	11.22	\$	14.74	
	Total lines		25,700		408,542		397,780		144,215		1,195,368		643,380		2,812,984	
	Total lines served by DLC		25,700		382,096		278,768		82,397		485,442		135,555		1,389,949	
		<u></u>	Annual Cost		Units				Unit Cost							
End office swit	ching	\$	119,824,663													
	1. Port	\$	35,947,399		2,264,835		ritched lines	\$			er line/month					
	2. Usage	\$	83,877,264		39,498,911,389	mi	nutes	\$	0.0021	pe	er minute					
Signaling netw	Ork elements	\$	12,170,810													
	links	\$	102,646			link	·	\$	19.09	P	er link per month					
	STP	\$	10,461,718		3,620,952,112	TC	AP+ISUP messages	\$	0.00289	P	er message					
	SCP	\$	1,606,447		201,149,200	TC	AP messages	\$	0.00799	p	er message					
Transport netw	vork elements															
	1. Dedicated	\$	112,944,668		712,648		nka	\$	13.21	P	er DS-0 equivalent/month	י				
	Switched Special	•	26,070,629 86,874,039		164,498 548,150											
	Specia	•	00,074,038		048,100			\$	0.00131	P	er minute					
	2. Common	\$	12,981,152		2,520,651,122	mi	inutes	\$	0.00528	P	er minute per leg (orig or	tern	n)			
	3. Tandem switch inv	\$	3,791,901		2,140,624,776	mi	inutes	•	0.0018	P	er minute					
Operator syste		\$	7,342,907		n/a											
Total		\$	749,543,657													
Total wholesal	e cost per switched line	•	21.44													

U.S. WEST BENCHMARK (BCM) OR THE BCM2 MODELS ARE INAPPROPRIATE AND MISSTATE ACTUAL COSTS

DESPITE THEIR CLAIMS, NEITHER MODEL ACTUALLY USE CENSUS BLOCK GROUPS (CBGs).

- These models assume that the CBG boundaries are square in order to facilitate calculations. Most CBGs are irregular in shape. Both voids and overlaps are created when assumed CBG boundaries are actually mapped to the true CBG boundaries. These voids and overlaps result in the costs being determined on an assumed equivalent square CBG, thereby distorting the level of support necessary for the actual service area. Further misallocation of costs among LECs results from the fact that LECs service areas/customer locations may be significantly different than the area mapped by the CBG. All CBG costs are assigned to a LEC, not multiple LECs serving a CBG.
- The CBG boundaries do not coincide with existing LEC serving areas, nor are they likely to coincide with the service areas of new entrants. As a result, any proxy that employs a CBG approach would require that the serving eligible carriers all map their customers to the CBG boundaries described in the particular model, in order to determine the support per customer. SWBT, and presumptively most other LECs, do not presently have this detailed customer mapping. This would be an expense that would have to be incurred in connection with this hypothetical approach.

U.S. WEST BENCHMARK (BCM) OR THE BCM2 MODELS ARE INAPPROPRIATE AND MISSTATE ACTUAL COSTS

(continued)

 Many of the concerns expressed in the previous section on the Hatfield model regarding investment assumptions, fill factors, expense loadings, etc. also apply to the BCM models, and are not repeated here.

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COMPARISON OF ACTUAL COSTS TO BCM2 COSTS BY MISSOURI LEC

	SWBT Study Local Exchange Costs, per Line, per Mo.	BCM2 Costs, per Line, Per Mo.	HATFIELD Study Release 2.2, Version1, AT&T - 7/3/96
<u>MISSOURI</u>	•	•	
ALLTEL MISSOURI INC	\$53.02	\$67.67	NA
ALMA TELEPHONE CO	\$54.21	\$72.77	NA
BOURBEUSE TEL CO	\$37.84	\$58.04	NA
BPS TELEPHONE CO	NA	\$56.18	NA
CASS COUNTY TEL CO	NA	\$55.13	NA .
CHARITON VALLEY TEL	\$50.26	\$70.60	NA
CHOCTAW TELEPHONE CO	\$46.51	\$90.81	NA
CITIZENS TEL CO - MO	\$54.83	\$43.23	NA
CONTEL AR DBA GTE AR	NA	\$85.64	NA
CONTEL MO DBA GTE MO	\$59.59	\$56.34	NA
CRAW-KAN TEL COOP-MO	\$53.34	\$72.47	NA
EASTERN MISSOURI TEL	\$41.58	\$70.71	NA
ELLINGTON TEL CO	\$56.35	\$107.13	NA
FARBER TEL CO	\$64.63	\$98.02	NA NA
FIDELITY TEL CO	\$42.21	\$42.43	NA NA
GOODMAN TEL CO	\$36.25	\$52.90	NA NA
GRANBY TELEPHONE CO	\$37.84	\$51.90	NA NA
GRAND RIVER MUTUAL	\$46.12	\$72.69	NA NA
GREEN HILLS TEL CORP	\$58.95	\$75.92	NA NA
GTE NORTH INC - MO	\$41.46	\$40.55	NA NA
GTE SOUTHWEST - AR	NA NA	\$120.38	NA NA
HOLWAY TEL CO	\$74.49	\$83.80	NA NA
IAMO TEL CO	\$58.40	\$72.99	NA NA
KANSAS STATE TEL -MO	NA NA	\$43.55	NA NA
KINGDOM TELEPHONE CO	\$58.49	\$66.33	NA NA
KLM TELEPHONE CO	\$53.96	\$66.53	NA NA
LATHROP TELEPHONE CO	\$37.84	\$50.49	NA NA
LE-RU TELEPHONE CO	\$85.95	\$73.55	NA NA
MARK TWAIN RURAL TEL	\$58.53	\$83.51	NA NA
MCDONALD CO TEL CO	\$37.84	\$55.46	NA
MID-MISSOURI TEL CO	\$58.60	\$75.83	NA NA
MILLER TEL CO INC	\$37.84	\$77.29	NA
MISSOURI TEL CO	\$39.21	\$65.48	NA
MO-KAN DIAL INC	\$41.29	\$62.38	NA
NE MISSOURI RURAL	\$74.75	\$82.53	NA
NEW FLORENCE TEL CO	\$49.88	\$73.03	NA
NEW LONDON TEL CO	\$56.62	\$55.43	NA
ORCHARD FARM TEL CO	\$111.65	\$49.82	NA
OREGON FARM MUTUAL	\$37.84	\$69.74	NA
OZARK TELEPHONE CO	NA	\$48.29	NA
PEACE VALLEY TEL CO	\$53.84	\$94.23	NA
ROCK PORT TEL CO	\$37.84	\$66.54	NA
SENECA TEL CO	\$37.84	\$50.67	NA
SOUTHWESTERN BELL	\$39.95	\$28.11	NA
STEELVILLE TEL EXCH	\$47.86	\$97.28	NA
STOUTLAND TEL CO	\$54.31	\$97.13	NA
UNITED TEL CO OF MO	\$42.51	\$42.36	NA
WHEELING TEL COMPANY	\$68.60	\$97.26	NA
TOTAL MISSOURI	\$40.40	\$34.17	\$19.15

per Line per Month

Evolunce #		DCM 2 Study
Exchange #	SWBT Study	BCM 2 Study
1	294.41	\$34.14
2	249.01	n/a
3	226.16	\$60.99
4	195.93	\$112.87
5	179.93	\$63.65
6	175.51	\$61.59
7	169.12	\$87.19
8	170.59	\$67.37
9	171.85	\$66.73
10	182.19	\$26.18
11	155.03	\$89.73
12	156.09	\$63.05
13	152.37	\$65.30
14	154.85	\$94.03
15	150.44	n/a
16	140.78	\$60.88
17	137.35	\$70.89
18	139.08	\$63.80
19	137.41	\$67.47
20	135.93	\$61.19
21	132.12	\$54.08
22	135.61	\$47.09
23	126.89	\$104.89
24	139.83	\$36.35
25	137.90	\$54.16
26	130.29	\$83.11
27	119.89	\$53.69
28	120.30	\$40.94
29	114.05	\$43.95
30	114.40	\$58.41
31	116.92	\$78.47
32	109.94	\$91.21
33	106.79	\$64.92
34	104.01	\$49.63
35	105.11	\$57.32
36	105.17	\$63.80
37	104.12	\$63.69
38	106.44	\$83.37
39	102,33	\$58.30
40	100.19	\$69.04
41	98.90	\$61.38
42	97.96	\$52.25
43	97.09	\$67.99
44	100.41	\$39.95
45	98.15	\$65.74
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per Line per Month

		Line per Month
Exchange #	SWBT Study	BCM 2 Study
46	95.94	\$77.15
47	96.61	\$67.11
48	94.17	\$74.48
49	91.55	\$32.84
50	95.07	\$73.73
51	95.07	\$85.89
52	91.96	\$42.09
53	88.12	\$57.56
54	90.85	\$63.30
55	87.57	\$51.00
56	89.61	\$47.16
57	86.61	\$72.69
58	87.99	\$41.91
59	97.82	\$43.53
60	84.58	\$51.40
61	84.26	n/a
62	87.06	\$59.42
63	81.92	\$41.05
64	85.65	\$79.89
65	78.56	\$56.94
66	81.73	\$65.19
67	83.23	\$53.87
68	82.88	\$51.08
69	79.21	\$41.41
70	80.44	\$57.91
71	79.37	\$78.50
72	76.04	\$38.45
73	80.52	\$41.66
74	76.44	\$66.72
75	77.06	\$40.03
76	76.12	\$77.01
77	75.64	\$78.88
78	78.68	\$83.12
79	75.06	\$65.64
80	71.24	\$59.39
81	73.81	\$66.19
82	80.37	\$49.82
83	72.73	\$45.10
84	71.66	\$35.35
85	71.33	\$60.91
86	71.50	\$34.23
87	69.50	\$38.41
88	71.85	\$35.80
89	71.65	\$37.98
90	80.22	\$49.28
90	00.22	⊅49.∠8

per Line per Month

		Line per Month
Exchange #	SWBT Study	BCM 2 Study
91	73.29	\$71.38
92	81.04	\$46.59
93	74.22	\$29.78
94	76.57	\$54.58
95	69.34	\$41.51
96	78.16	\$41.21
97	67.51	\$48.02
98	72.44	\$41.72
99	63.23	\$39.45
100	68.20	\$34.69
101	64.20	\$36.10
102	60.17	\$33.56
103	70.69	\$50.02
104	64.11	\$32.50
105	63.75	\$37.82
106	58.89	\$38.59
107	73.66	\$68.21
108	52.69	\$50.69
109	79.12	\$38.75
110	77.01	\$41.10
111	59.43	\$73.59
112	70.86	\$39.23
113	56.55	\$49.71
114	51.06	\$32.41
115	50.26	\$56.70
116	53.47	\$42.82
117	56.72	\$86.18
118	47.34	\$52.54
119	55.26	\$34.77
120	48.66	\$33.85
121	60.53	\$33.95
122	52.70	\$29.51
123	48.28	\$29.38
124	45.68	\$44.09
125	51.05	\$33.24
126	48.90	\$33.24 \$40.19
127	50.09	\$40.19 \$36.71
128	52.62	\$29.31
	44.34	
129		\$32.79 \$38.56
130	46.76	\$28.56
131	42.00	\$41.46
132	52.70	\$33.75
133	46.24	\$33.55
134	67.97	\$44.80
135	44.46	\$32.60

per	Line	per	Mor	nth
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	per Line per M	
Exchange #	SWBT Study	BCM 2 Study
136	44.43	\$32.84
137	44.07	\$44.40
138	40.65	\$35.05
139	42.18	\$34.18
140	39.63	\$30.48
141	45.00	\$29.83
142	50.19	\$26.06
143	39.20	\$45.86
144	42.79	\$35.22
145	39.41	\$32.81
146	42.22	\$34.75
147	37.41	\$38.26
148	35.30	\$37.92
149	39.72	\$29.73
150	40.88	\$31.75
151	42.85	\$27.80
152	40.45	\$27.24
153	37.28	\$26.70
154	36.24	\$34.49
155	44.33	\$25.89
156	44.46	\$32.71
157	36.30	\$27.81
158	37.26	\$28.62
159	47.92	\$32.71
160	38.14	\$27.00
161	36.79	\$27.49
162	36.17	\$25.03
163	36.16	\$27.80
164	30.51	\$24.72
165	35.72	\$27.68
166	38.69	\$29.15
167	38.65	\$27.54
168	45.83	\$27.63
169	32.81	\$28.65
170	32.99	\$26.08
171	35.86	\$25.29
172	30.68	\$29.26
173	28.28	\$31.98
174	37.01	\$25.87
175	49.58	\$28.01
176	40.49	\$29.37
177	26.44	\$30.44
178	28.74	\$27.48
179	26.25	\$26.62
180	27.46	\$26.55
100	21.40	\$∠0.35

per Line	per Month

per Line per Monta		
Exchange #	SWBT Study	BCM 2 Study
181	25.09	\$26.32
182	27.83	\$23.05
183	23.48	\$26.12
184	23.95	n/a
185	20.75	\$26.08
186	26.26	\$23.34
187	33.39	\$24.10
188	37.49	\$27.83
189	26.54	\$26.13
190	21.98	\$23.69
191	22.57	\$32.06
192	17.60	\$23.79
193	30.12	\$23.20
194	25.77	\$24.29
195	24.05	\$22.01
196	23.95	\$24.44
197	27.01	\$26.94
198	33.75	\$23.09
199	32.60	\$22.15
200	24.39	\$24.31
201	17.41	\$30.36
202	39.44	\$22.85
203	19.52	\$21.59
204	25.12	\$24.55
205	23.86	\$22.33
206	28.65	\$23.37
207	36.19	\$15.73
208	17.54	\$24.50
209	21.92	\$19.97
210	21.62	\$18.91
211	14.77	\$21.69
212	25.93	\$16.08

PACIFIC BELL/INDETEC COST PROXY MODEL CANNOT BE EVALUATED

SWBT purchased model output for Texas and compared it with SWBT's actual cost study. However, the model logic Is proprietary and not available for review. Consequently, SWBT is unable to determine why the model produces differing results from actuals.

COMPARISON OF ACTUAL INVESTMENT TO BCM2 & CPM

Investment per line in Dollars

WC #	SWBT ACTUAL STUDY	Preliminary BCM2 Results	BCM2 as a Percent of ACTUAL	Preliminary CPM Results	CPM as a Percent of ACTUAL
1	1,332.62	1,166.80	87.56%	975.94	73.23%
2	680.44	838.73	123.26%	1,087.99	159.89%
3	2,069.40	1,240.90	59.96%	1,462.71	70.68%
4	2,041.26	1,228.89	60.20%	1,465.87	71.81%
5	2,207.14	1,946.93	88.21%	2,017.69	91.42%
6	1,481.01	1,625.33	109.74%	1,922.82	129.83%
7	739.59	784.84	106.12%	1,037.70	140.31%
8	3,192.04	1,807.31	56.62%	2,289.14	71.71%
9	2,031.26	1,227.00	60.41%	1,649.13	81.19%
10	1,121.61	1,322.62	117.92%	1,176.53	104.90%
11	1,825.19	2,423.53	132.78%	2,403.68	131.70%
12	7,297.56	4,469.20	61.24%	9,306.56	127.53%
13	883.57	837.91	94.83%	1,181.37	133.70%
14	1,174.49	1,169.86	99.61%	1,610.55	137.13%
15	2,849.38	1,725.75	60.57%	1,990.42	69.85%
16	1,050.19	842.81	80.25%	1,243.50	118.41%
17	1,077.38	1,445.65	134.18%	1,724.75	160.09%
18	3,960.39	1,593.09	40.23%	1,668.28	42.12%
19	1,210.41	925.72	76.48%	965.77	79.79%
20	3,306.81	1,545.03	46.72%	5,813.43	175.80%
21	909.81	794.95	87.37%	1,211.51	133.16%
22	1,063.59	813.98	76.53%	1,207.24	113.51%
23	1,458.86	4,356.07	298.59%	993.38	68.09%
24	3,273.76	1,441.52	44.03%	1,874.11	57.25%
25	840.63	415.54	49.43%	1,052.60	125.22%
26	1,839.87	1,835.62	99.77%	2,107.35	114.54%
27	1,230.13	826.62	67.20%	1,653.62	134.43%
28	1,359.13	949.77	69.88%	1,560.22	114.80%
29	6,510.30	2,525.59	38.79%	2,638.22	40.52%
30	1,021.35	1,159.71	113.55%	1,823.26	178.51%
31	721.09	714.84	99.13%	1,065.58	147.77%
32	1,451.61	1,109.99	76.47%	1,406.47	96.89%
33	1,284.02	1,111.79	86.59%	1,306.88	101.78%
34	1,386.47	1,837.44	132.53%	2,138.72	154.26%
35	1,303.78	750.90	57.59%	1,396.21	107.09%

COMPARISON OF ACTUAL INVESTMENT TO BCM2 & CPM

Investment per line in Dollars

WC #	SWBT ACTUAL STUDY	Preliminary BCM2 Results	BCM2 as a Percent of ACTUAL	Preliminary CPM Results	CPM as a Percent of ACTUAL
36	1,894.30	1,101.67	58.16%	1,875.18	98.99%
37	1,174.48	853.64	72.68%	1,195.85	101.82%
38	1,794.21	1,075.39	59.94%	1,672.39	93.21%
39	684.34	531.12	77.61%	781.30	114.17%
40	3,250.33	1,812.77	55.77%	2,498.70	76.88%
41	4,265.52	2,863.18	67.12%	7,402.91	173.55%
42	1,599.42	1,191.48	74.49%	1,587.66	99.26%
43	2,863.52	2,739.04	95.65%	1,727.91	60.34%
44	770.25	730.18	94.80%	1,216.03	157.88%
45	2,771.43	3,224.51	116.35%	4,574.71	165.07%
46	2,094.10	2,345.14	111.99%	1,938.16	92.55%
47	1,353.40	1,461.61	108.00%	1,855.12	137.07%
48	2,288.07	2,261.30	98.83%	3,209.15	140.26%
49	3,867.88	1,995.30	51.59%	7,078.23	183.00%
50	1,568.29	1,201.96	76.64%	1,412.01	90.03%
51	1,468.01	1,033.52	70.40%	1,917.57	130.62%
52	1,356.99	856.71	63.13%	1,547.66	114.05%
53	1,727.67	1,003.78	58.10%	1,112.02	64.37%
54	1,725.29	1,134.92	65.78%	1,393.55	80.77%
55	690.46	714.16	103.43%	789.27	114.31%
56	1,015.18	886.93	87.37%	1,302.03	128.26%
57	2,158.47	1,934.68	89.63%	1,895.33	87.81%
58	1,232.32	1,109.97	90.07%	1,437.98	116.69%
59	828.80	802.17	96.79%	1,027.30	123.95%
60	3,752.69	1,790.21	47.70%	2,281.10	60.79%
61	2,009.91	1,429.33	71.11%	1,408.38	70.07%
62	854.83	975.18	114.08%	1,463.10	171.16%
63	3,854.41	2,836.92	73.60%	9,081.94	235.62%
64	2,495.43	3,816.00	152.92%	4,277.63	171.42%
65	764.90	767.33	100.32%	1,313.95	171.78%
66	894.69	868.46	97.07%	1,106.62	123.69%
67	1,154.44	1,065.11	92.26%	1,456.88	126.20%
68	1,808.30	1,148.56	63.52%	1,360.52	75.24%
69	2,838.80	1,520.67	53.57%	3,026.82	106.62%
70	1,387.40	1,644.49	118.53%	1,605.40	115.71%

COMPARISON OF ACTUAL INVESTMENT TO BCM2 & CPM Investment per line in Dollars

WC #	SWBT ACTUAL STUDY	Preliminary BCM2 Results	BCM2 as a Percent of ACTUAL	Preliminary CPM Results	CPM as a Percent of ACTUAL
71	1,985.39	2,208.86	111.26%	2,361.55	118.95%
72	1,646.19	1,000.28	60.76%	1,282.57	77.91%
73	2,669.53	3,924.68	147.02%	7,056.51	264.34%
74	1,335.57	1,103.71	82.64%	1,447.66	108.39%
75	4,216.75	2,822.24	66.93%	2,512.06	59.57%
76	899.92	666.42	74.05%	944.35	104.94%
77	843.43	918.88	108.95%	1,268.22	150.37%
78	1,303.13	1,190.78	91.38%	1,333.47	102.33%
79	2,310.09	1,585.36	68.63%	1,412.25	61.13%
80	1,330.43	1,052.96	79.14%	1,227.98	92.30%
81	967.61	1,233.57	127.49%	1,829.71	189.10%
82	683.27	928.85	135.94%	1,173.44	171.74%
83	1,959.51	1,206.67	61.58%	1,890.45	96.48%
84	953.81	903.19	94.69%	1,233.75	129.35%
85	1,937.54	2,090.47	107.89%	4,150.16	214.20%
86	1,858.50	2,053.01	110.47%	1,927.73	103.72%
87	2,834.64	2,480.41	87.50%	2,553.49	90.08%
88	1,673.59	938.26	56.06%	1,389.88	83.05%
89	4,482.28	3,269.56	72.94%	2,600.49	58.02%
90	1,194.78	864.09	72.32%	1,212.00	101.44%
91	1,002.11	951.03	94.90%	1,272.34	126.97%
92	2,018.63	1,388.06	68.76%	1,654.50	81.96%
93	1,127.84	885.72	78.53%	1,200.22	106.42%
94	1,570.10	1,248.41	79.51%	1,702.72	108.45%
95	850.82	910.98	107.07%	1,179.48	138.63%
96	5,049.45	1,838.86	36.42%	2,059.64	40.79%
97	796.37	734.00	92.17%	1,078.56	135.44%
98	2,925.76	1,147.71	39.23%	2,759.78	94.33%
99	944.98	719.87	76.18%	999.14	105.73%
100	1,230.80	1,121.37	91.11%	1,352.57	109.89%
101	1,823.88	1,121.79	61.51%	1,474.81	80.86%
102	671.96	554.58	82.53%	941.63	140.13%
103	2,395.11	1,858.68	77.60%	2,579.66	107.71%
104	1,396.45	1,158.11	82.93%	1,286.23	92.11%
105	876.99	1,148.14	130.92%	1,293.24	147.46%